

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

COAST TO COAST TITLE, LLC, SOL §
CITY TITLE, LLC, MAGNOLIA TITLE §
ARKANSAS, LTD., MAGNOLIA TITLE §
FLORIDA, LLC, THE PEABODY, §
BULLDOG LLC, AND JOHN MAGNESS §

Plaintiff, §

v. §

Civil Action No. 4:24-CV-2767

TYRELL L. GARTH, PHILLIP H. §
CLAYTON, DEBBIE MERRITT A/K/A/ §
DEBORAH MERRITT, MATTHEW D. §
HILL, CHARLES BURNS, P. GARRETT §
CLAYTON, SCOTT M. REEVES, ARIANE §
E. YOUNG, TINGLEMERRITT, LLP, §
STARREX TITLE FLORIDA, LLC LAURIE §
COOPER, MARKETSTREET CAPITAL §
PARTNERS, LLC, MARKETSTREET §
CAPITAL PARTNERS AR, LLC AND §
BRIAN A. BREWER §

Defendants. §

Declaration of Scott M. Reeves

1. My name is Scott M. Reeves. My birthdate is May 19, 1969. I am over the age of 18 years. I have never been convicted of a felony or crime involving moral turpitude. I am fully competent to make this declaration. I have personal knowledge of all the facts stated herein, and the statements herein are true and correct. My address is 201 Grizzly Rise, Cochrane, Alberta Canada T4C 0B5.
2. I am a citizen and resident of Canada. I currently reside in Cochrane, Alberta, Canada.
3. I have served as a Director of the Board of Starrex International Ltd. ("Starrex") since December 4, 2019.
4. I do not work in Texas. I do not own real or personal property in Texas or pay taxes in Texas. I do not maintain any mailing addresses, phone numbers, bank accounts, or insurance policies in the forum state.

EXHIBIT

A

exhibits.sticker.com

5. I have only traveled to Texas one time for business related to Starrex on November 17, 2021, however, that trip was for the purpose of a transaction unrelated to the allegations in this matter.
6. I deny making misrepresentations to John Magness (or anyone else) about Debbie Merritt's qualifications. I deny making any representations to John Magness (or anyone else) about Debbie Merritt's background and/or experience. I deny attending "frequent" phone meetings attended by John Magness. I only recollect my participation in one phone call in which John Magness was a participant, and during that one phone conversation, I was acting as counsel for Starrex. I deny participating in any calls or meetings aimed at "recruiting John Magness and his Texas-based business connections" and I did not communicate with any Magnolia Entities' employees or personnel. I deny ever speaking with or meeting Nelson Mitchell.

I declare under penalty of perjury under the laws of the United States and Canada that the foregoing is true and correct.

Signed on this 26 day of November, 2024 in Alberta, Canada.

/s/

Scott M. Reeves